

Friday, December 14, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

RE: MB Docket No 05-311 In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992

We are writing in support of the Comments of the Cable Act Preservation Alliance (“CAPA”) in the Second Further Notice of Proposed Rule Making. In reply to the comments submitted by the City of Ann Arbor on November 14, 2018, I oppose the tentative conclusions the FCC reaches in the proceeding because of their impacts on our community.

I am employed (since 2011) by CTN, a public service provided by the City of Ann Arbor since 1973. I can tell you firsthand how important community media is for our public. I have trained hundreds of diverse members on media literacy and on how to produce quality video content. Many of those people have gone on to do great things in video production, including accepting first place awards, becoming on-air talent for syndicated stations, and networking with local film makers to create outstanding content. I work with students who have disabilities and are not able to choose elective credits during their school hours, so they work with me at CTN to produce video content as an after-school educational program. This partnership has helped these students create communication and coordination skills and so much more. Another example: CTN’s volunteer ages range from 10-80 years old. Most of the time, these people are working side by side to help each other create content that is informational, entertaining and educational. We see religious volunteers crewing on atheist shows. Where else would you see this diversity? If we remove franchise & PEG fees from municipalities, we are essentially muting the community’s voices.

Our Public, Education & Government station is only able to provide community engagement and media training because of the funding we receive from franchises & PEG fees, which the industry gives back to our city for use of the Public Right of Way. This FCC FNPRM is a power grab for land use at a low cost. Companies who use the Right of Way should have to pay market value for the use of this space. Our most watched shows include City Meetings, which allow the community to have a voice in how our local government works.

Stations like CTN Ann Arbor help people in our community get jobs in a very competitive field. We help grow government transparency and allow community members a place to connect, create and communicate. For example, here are a handful of testimonials from CTN clients who use our services:

“Community Television Network (CTN) and the Communication, Media and Public Policy (CMPP) magnet program at Skyline High School have been collaborating on several levels for over five years. The CMPP magnet is a three-year program involving approximately one hundred fifty 10th, 11th and 12th graders. Students learn policy analysis (10th grade) and digital media production (11th grade). CMPP students apply the policy analysis and digital media skills to provide public relations services to local non-profits (12th grade).

With the invaluable help of CTN, instruction in CMPP reflects the findings of proven research in education reform -- project based learning with authentic products and audiences for student work. CMPP's collaboration with CTN has enhanced the educational experience and improved assessment outcomes for hundreds of high school students. Specific examples are listed below:

CTN Promotes Project Based Learning:

CTN provides invaluable training (to magnet teachers and students) in media literacy and in broadcast communication. Working closely with CTN, CMPP students have produced high quality news shows (similar to CNN's student news show CNN10).

CTN provides training as part CMPP's collaboration with the Legacies Project. The Legacies Project is an oral history project. CMPP students video record the life stories of ten to twelve senior citizens. With help from CTN, students learn the video production process as it is practiced by professionals in the field. CTN's support is vital to helping students with hands on instruction in pre-production, camera directing, audio, lighting and post-production using professional quality editing software.

CTN also provides advanced training in video production and video editing for the CMPP Media Group -- the 12th grade focus on providing digital media services to local non-profits. CTN's expertise has helped students create professional quality public service announcements for more than 30 local non-profits since the start of the collaboration with CMPP.

CTN Provides an Authentic Audience:

Student learning outcomes are highest when students have a real world or authentic audience for their work. CMPP relies on CTN for that audience.

The culminating product of the Legacies Project is a short film about each narrator, edited with support from CTN. These short films are part of a 90 minute program aired, multiple times, on CTN.

There are several final products for 12th graders: the digital media products developed for local non-profits and their capstone projects (short films that reflect their accumulated analysis and digital media skills). These products are aired, multiple times, on CTN.

CTN Promotes Media Literacy:

With CTN's help, CMPP students have demonstrated an increased ability to think critically about information delivered via digital and social media. CTN's training methodology helps students question sources and explore bias in news reporting, information gathering and policy analysis.”

Submitted by:

Ross Dunbar, CMPP Lead Teacher and Social Studies Faculty

Cate McCraw, CMPP Lead Teacher and Social Studies Faculty

Patricia Douglas Jenkins, CMPP Founder

“The League of Women Voters of the Ann Arbor Area has had a candidates' forum and voter information partnership with CTN for over two decades. Indeed, because of the loss of legacy media in the area, the League/CTN partnership has become more important to voters seeking nonpartisan, independent information about candidates and ballot proposals. A recent example is the debates CTN broadcast on state Proposals 2 and 3. These two debates featured two area high school debate teams. Not only is CTN providing a critical and essential platform for fair and open discussions necessary for a democracy to thrive. It is offering opportunities for civics education to new generations through the high school debate program partnership with the League.”

Submitted by:

Jeanine DeLay, Former Director LWV-AAA Candidate Forums (2009-2017)

Susan Prakken Smith, President LWV-AAA

“CTN has been of immense benefits to us and our community.

1. Riprap/s primary task at CTN has been to produce a 30-minute program each week for over 20 years on academic books. Our guests have included an U.S. Post Laureate (Robert Hass) and many others, including an university president, a scholar from Paris, and many others, including a pediatrician in Flint, Michigan, trying to help people poisoned by lead in that city's water. We have also participated in various CTN events, including outreach activities.

2. Because of CTN's helping our ability to broadcast our kind of programs, we have extended the awareness of the Ann Arbor community in a stunning scope of our over 200 programs.

3. CTN programming has made it possible to offer our wide-ranging program subjects. This happened at a time when various commercial programs, including *Book TV* and the *Charley Rose* show, have gone off the air.”

Submitted by:

Jim Schaefer, Executive Producer and President Riprap: The Academic Book Television Program

“I am writing this email to provide insights as to my experience of being a producer/volunteer at CTN since 2008 To begin with, I believe in the public value of CTN and the ability of community residents to provide visual content to others as a unique medium not available in other formats. Ann Arbor's system has been active since 1973 and truly has contributed a unique way of bringing citizens together with an incredible wide variety of formats from religious programming to historical programming, and methods for citizens to speak their minds concerning issues of the day.

My first foray into producing my own projects involved visiting some local areas of interest that I felt residents of the community would enjoy including an in-depth tour of the Michigan theater with director Russ Collins, and a tour of Bethlehem cemetery with well-known historian Wylan Stevens.

Over the years, I've learned how to use cameras, edit studios, lighting, and how to adjust adequate sound on various productions and have worked with other producers in helping get their projects completed. Currently, I utilize the Hotline studio and am able to produce a frequent program, "A2 Insight" hosting local guests of interest for discussions ranging from politics, historical aspects of Ann Arbor to discussing books with local authors. The true advantage of an organization like CTN is that there are no outside pressures regulating or developing content

unlike political or commercial organizations. CTN is truly the "People's Place" to present an incredible variety of creative work to the community. The unique option for residents of Ann Arbor to create and produce their own content for distribution to the larger community is an invaluable visual legacy for future generations, and, in my opinion, an invaluable resource that makes for a more inclusive, close-knit community."

Submitted by:

James Trost, Host A2 Insight & Community Producer

"The Ann Arbor Area Transportation Authority (TheRide) supports the work of the local CTN Network in allowing the community access to relevant and important information about their local government. TheRide serves the greater Ann Arbor and Ypsilanti areas, helping people get to the places they need to go. TheRide is able to broadcast their public board of directors meetings each month on CTN, allowing the agency to be transparent to the organization's stakeholders and giving access to the important information the riders and community need about the organization. Without a service such as CTN, TheRide would incur additional costs in staff time, outreach, and production to be as transparent to the community as the community requires. We appreciate the value that CTN provides our stakeholders in providing access to our information."

Submitted by:

Samantha Potter, Marketing and Communications Coordinator, Community Relations
TheRide // Ann Arbor Area Transportation Authority

"It is my pleasure to say that CTN, is the most important local TV in Ann Arbor. We needed it badly. It is the only place you can express your thoughts and feelings honestly and without editing. As a school social worker in Ann Arbor Public schools; the schools started using CTN of my programs since 1990. Later I start using CTN, Soapbox, Access Ann Arbor, and I was also did the training. CTN is respected and loved, the staff are very pleasant and helpful for our needs. If you put a message they respond to you as soon as possible. You can't put anything bad sexual things or waste your time listening to advertising things are not needed. CTN with help of the city recently is very helpful for the host, you don't need to pay for CD of the program especially if you have to pay for your presenters. CTN is a treasure for the community. From all my heart I encourage you to support CTN. "I have the freedom to do anything I want...my conscience is my guide."

Submitted by:

Elaine Rumman, Community Producer

I am Tom Fivenson- a resident of Ann Arbor & a creator/producer on the Ann Arbor Community Television Network. I am a singer, songwriter & teacher with an interest in early childhood education & entertainment. My involvement at the station provides for me an important means of expression that allows me to interact directly with my community in an expressive & creative manner. My children's music show - Copper Tom's Musical Playhouse -has been very well received by local parents & young children in Ann Arbor & in the surrounding region. This program is real & relaxed- like a local, accessible 'Mr. Rogers' & has been called 'a breath of fresh air' in children's television and programming- without the frenetic pace of contemporary network programming- & with no advertising or selling to parents & kids. It has allowed me to connect directly with the community & in a manner that would not be possible in any other way.

Families in the area depend on me to provide fresh, unadorned educational entertainment for young children on a regular basis, knowing that it is not available in any other way- except via this valuable community entity. I- and my patrons value CTN (The Community Television Network) in the very same way we do public libraries – as an invaluable part of living here- something that helps foster creative expression, connection & love of community.

Submitted by:

Tom Fivenson, Community Producer

“CTN/FCC,

Please note that changes to the operation and funding of CTN would be detrimental to CTN and the community they serve by limiting information that is crucial to the residents of Ann Arbor and the world.

I am a volunteer for a non-profit addiction prevention and treatment facility, who organizes lectures on addiction and its impact to the addict, families, employers and community. Because of the training and expertise I received from CTN we are able to film and edit these lectures for viewing to the Ann Arbor community. Many folks are unable to attend these lectures personally and CTN permits a venue in which this information is decimated to the masses.

In addition to the Ann Arbor Community we upload these videos to YouTube for viewing for anyone who is interested in addiction prevention and treatment. This is all made possible because of the following CTN efforts:

- Training to use and operate video equipment to properly shoot videos of lectures and seminars
- Training for use of editing software to bring the rough video to a product that can be viewed on TV, YouTube and downloaded to DVD for schools, community organizations and individual viewing
- Help from CTN technicians in techniques for shooting videos, editing videos and use of computer software to develop a quality product for viewing
- Airing of the materials on the CTN network to the Ann Arbor Community

Without the help of CTN this information wouldn't be available to many people and organizations. Addiction prevention and treatment information is not important enough to the mainstream television or radio networks to air the lectures we perform. Without a Community Television Network to fill that gap valuable and crucial information regarding addiction prevention and treatment will not get out to those that need it.”

Submitted by:

Dale E. Schotts, Volunteer, Dawn Farm

“I have utilized CTN services and worked with CTN in various ways since about 1995 related to volunteer work I have done, first with a volunteer substance abuse prevention group (Community Action on Substance Abuse) and since 2003 with Dawn Farm, a non-profit substance use disorder treatment provider. CTN services we have utilized include: filming public service programs and announcements at the CTN studio and posting CTN “bulletin board” notices related to informing our community about free events and services; information dissemination through broadcasting videos on substance use disorder issues; recruiting volunteer videographers trained by CTN to film educational events which were later broadcast on CTN; and recently having a Dawn Farm volunteer undergo the training offered by CTN and utilize CTN equipment

to film and edit videos for broadcast and on-line posting of Dawn Farm's on-site educational programs, which greatly increases the reach and scope of these presentations.

People affected by substance use disorders face barriers of stigma, shame, misinformation, lack of information and hopelessness that prevent them from reaching out for help. CTN broadcasts and services we utilize enable us to reach people who may need accurate information, help and hope, but may not yet be reaching out. We've had positive responses from people who have seen the info we broadcast on CTN, and CTN training, equipment loans and other services enable Dawn Farm to continue to film and broadcast information to our community, and to reach people we would not have the opportunity to reach via local media."

Submitted by:

Jess Antanaitis, Volunteer, Dawn Farm

"Neutral Zone has deeply valued its community partnership with the Neutral Zone. We only started a videography program many years ago because of Alysha's encouragement to build a partnership and champion the program. We now run the program independent of CTN with paid staff but rely on CTN for support, training, and a space for our teens to explore and work in a studio. We would not want to see this program change- these opportunities are critical for our youth to have access to technology, communication tools, and to impact the media creating a society with integrity and transparency."

Submitted by:

Lori Roddy, Executive Director, Neutral Zone

"I have been recording reports of the Ann Arbor Public Schools' Superintendent for the past five years and providing the recordings to CTN to play back on their educational channel.

These reports are of great benefit to the community in that they provide great transparency to the administration's actions at the Ann Arbor Public Schools and the work of the superintendent."

Submitted by:

Scott Nadeu, Video and Internet Stuff, LLC

At Community Television Network in Ann Arbor, I learned how to film, edit, and produce quality programs. My work includes documentaries on the National Alliance on Mental Illness Washtenaw County, the Interfaith Council for Peace & Justice in Ann Arbor, and the Ann Arbor Garden Club. I have produced personal programs on poetry (my own and other Ann Arbor poets), peace initiatives through the Ann Arbor Friends Meeting, and women's issues (2016 Presidential Campaign, & women in motocross racing). I also assisted on a regular program about disability issues. It is important to have access to a public station that allows Ann Arbor citizens to express their views on a variety of topics. CTN is a valuable resource to the community and should be supported well into the future.

Submitted by:

Patricia McLaughlin, Community Producer & Local Film Producer

"I am writing in support of Community Television Network in Ann Arbor, and its many community benefits. CTN has broadcast weekly programs that I have produced for 1,128 consecutive weeks, and counting. Now in its 22nd year, my program is called "Songwriters Open Mic." I videotape local and regional musicians performing songs they have written themselves. The goals of the program are to provide entertainment that is locally based, and an opportunity

for local artists to be heard by their current or potential audiences. An additional element is that this public access program serves as an encouragement to emerging or “closet” musicians to perform their songs in public. The musicians I have recorded (and CTN has broadcast) are men and women who range from college-age to retirees. I’ve lost count long ago, but I know we’re talking about hundreds of performers and thousands of original songs -- and around 90% of this is videotaped within the city limits of Ann Arbor. We live in a vibrant community, artistically, and politically and educationally. CTN is truly a pillar of our strength in each of those areas. I watch all of the PEG channels from time to time, and I am particularly appreciative when I can dive into an issue on CTN such as an environmental concern or city planning; I even used to watch Pioneer High sports when my son played baseball there! So, it’s a big deal to me that CTN remains well supported. And I believe its staff does a great job in training “non-professionals” like me, as video and internet technologies change and offer new opportunities. Long run, I hope that community programming at outlets like CTN can continue to flourish as a noncommercial alternative, one that is deeply rooted in local viewers, their pursuit of personal expression, and the greater good.”

Submitted by:

Jim Novak, Community Producer

“Over the past ten years, I’ve participated with CTN in a number of ways both as a producer and a consumer of information. Recognizing that local community television provides an important public service to a broad range of viewers, I decided in my role as Director of Communications for the Rotary Club of Ann Arbor to solicit members interested in being trained to produce programs at CTN. We spent several evenings at the studio, learning to use the cameras, position lighting, arrange sets and work control room functions. We went on to produce programs that educated the public about the wide role of Rotary locally, nationally and internationally, about the global effort to eradicate polio, and the Ann Arbor Club’s working with the City to fund a \$1 million universally-accessible playground in a public park. CTN provides an important service in keeping citizens informed about City government. I value being able to attend City Council meetings using a virtual connection. I don’t have to be home watching on television, either. I’ve watched their meetings from the comfort of my sofa, 400 miles north in the Upper Peninsula. CTN is an asset for community organizations to reach people who may never see social media content. It is also an efficient, effective way for citizens to be informed about local government. At a time when print media are disappearing and our community has no local commercial television, CTN is especially important for the unique roles it fills. Thank goodness for CTN!”

Submitted by:

Maurita Peterson Holland, Associate Professor Emerita
School of Information, University of Michigan

“As a communication student, I know first-hand how important media is in the evolving digital world. Protecting public access stations should be a priority of every elected official who claims to be serious about the future of education. Where else can students learn (for free!) how to use professional equipment and interact with their community? The audio/visual courses I paid thousands of dollars for in college do not cover all of the education that is offered via workshops at CTN. Besides the value of education, CTN provides government transparency, which is something we literally cannot put a price tag on. When the public wants to hold their own

meetings, they choose CTN's studio as their meeting place. When the community wants to talk about activities and invite people to their organizations, they use Soapbox or have the option of creating promos for CTN to play on their public access channel.

The valuable work experience that I gained at CTN has peaked my interest in communications, and has provided me with in-depth knowledge into local politics. CTN truly is a community resource, and all of its benefits should be carefully considered when choosing how to give away the public right of way. While the large telecommunications companies are concerned with profit, CTN's only concern is providing these amazing services to the people of Ann Arbor."

Submitted by:

Pamela Mohar, Assistant Programmer

"As a volunteer producer for my local public access tv station since 1990 I find that I have a valuable resource to express my ideas and skills to our community.

Community Public Access Television provides local programming that the viewers would not be able to find from commercial television stations, from local government meetings, educational institutions, local news and local arts and cultural activities that benefit the citizens of their communities. I believe that the FCC proposed rule-making (Docket 05-311) would have a catastrophic impact on all Public, Educational and Governmental (PEG) cable access channels and community centers around the country."

Submitted by:

Dave Chappell, Volunteer Producer

"I am currently employed at Community Television Network in Ann Arbor as a production assistant, directing City meetings, shooting and editing promos and PSAs, doing field productions, and so much more. None of this would be possible without the mentorship of a community media station like HOMTV. The presence of a central hub for the dissemination of information to the public is essential to a sense of community in our ever-growing cities and townships. It is also vital to keeping the public up with technological advancements - these stations are home to technology that people would otherwise never have contact or training with. HOMTV in Meridian Township, MI is one of these crucial stations. After a rigorous year in their internship program, I acquired the skills that led to stable employment and learned the importance of participation in local government. The staff members and senior interns there taught me everything from the ground up, as I had no prior education in the broadcasting industry. From skills as simple as operating a camera to setting up an entire studio for a production, HOMTV was there to provide step-by-step instruction so that I could take this knowledge with me and create a career for myself. If funding should fall through for this station and others like it, we will be losing a great community asset and a necessary first step for any fledgling video content creators and multimedia journalists. Without community media stations like HOMTV, we would be lacking a network of professionals dedicated to teaching and informing the communities in which they reside."

Submitted by:

Jamie Chiu, Community Access Assistant

"Telling It is a community-based program that supports the healing and learning needs of school-aged youth living in Washtenaw County. The program is trauma-informed and resiliency building, using best practices from social work and education that are filtered through the

expressive arts. For two years, 2016-17, Telling It worked in partnership with Community Television Network (CTN) on a film project, each time with a group of 8th graders from Ypsilanti Community Middle School.

Each project was a yearlong and was guided by CTN's Alysha Schlundt-Bodien who visited the school in the early fall and met with the participating 8th graders, showing them how to use a video camera. The students filmed the weekly Telling It sessions and then, at the end of the school year, travelled to the CTN studios in Ann Arbor so they could edit the footage. The students were hands-on every step of the way and were thrilled and proud when, at the close of the school year, family members and teachers viewed the final product.

One of the students was invited with me to CTN to be interviewed on camera about his experience with this project. It was a transformative moment for him as, unexpectedly, a jazz band that was scheduled to perform gave an impromptu concert just for this young man. Now, when I see this high school student in the community, he still talks about what an incredible opportunity it was for him and his classmates to learn how to film, edit, be a sound engineer (each student recorded their poem for the video in a professional sound booth) and, especially for him, the kindness and generosity of the CTN staff and the jazz band when he came to be interviewed. All of us at Telling It are enormously grateful for the impact that Alysha and CTN have had on youth living in Ypsilanti."

Submitted by: Deb Gordon-Gurfinkel, Founding Director of Telling It, Lsa.umich.edu/tellingit

"Having worked in PEG Access for over twenty years, there is a great benefit that these channels offer both community producers and viewers alike. As someone who has scheduled the public access channel exclusively in my time at CTN in Ann Arbor, Michigan, I can tell you how important this channel is to the Ann Arbor community and its volunteer producers. It provides an outlet for them to voice their opinions and promote non-profit events while not only reaching a greater audience over local cable, but also providing them with the training and equipment to produce programs that are much more of a professional quality than many be not be able to achieve on their own. Public access provides an outlet for a diversity of programming ranging from the arts to religious to educational and everything in between. PEG channels also provide viewers local programming not available elsewhere, specifically city and township meetings and commissions as well as local board of education meetings. The funding these fees provide to communities are vital to accessible information that would likely not be available otherwise. If this funding were to cease, this outlet for uncensored, local programming would become unavailable for millions of Americans."

Submitted By: Craig Kuras, Program Assistant, 1997-2006 / Programmer, 2006-present
Community Television Network
City of Ann Arbor, Michigan

This local presence encourages viewers in our City of Ann Arbor to watch cable television as was intended by the 1984 Cable Act – by enhancing local voices, serving local viewers and strengthening our local democracy. By defining "in-kind" support in an overly broad fashion, the rule making will shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels which was never the intent of the Act.

By allowing cable operators to reduce franchise fee support for local communities if they opt for local channels, the FNPRM diminishes the ability of PEG channels to serve communities such as ours. We ask that it not be adopted.

Thank you.

Yours sincerely,

Alysha Schlundt-Bodien

Training & Facility Coordinator, CTN Ann Arbor